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April 30, 2024

**VIA CM/ECF**

Honorable Robyn F. Tarnofsky  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Kamran Khodakhah v. Montefiore Health System et al**  
**Case No.: 1:24-cv-00839-LAK-RFT**

Dear Judge Tarnofsky,

We write on behalf of the parties in furtherance of the Court's April 3, 2024, Directive (ECF #31) concerning Plaintiff's intention to file an Amended Complaint. Following the parties' meet and confer on April 25<sup>th</sup> and again on April 29<sup>th</sup>, Plaintiff wishes to file an Amended Complaint. Plaintiff proposes filing his Amended Complaint on/before May 17, 2024. The parties further request the opportunity to submit a proposed briefing schedule following the filing of Plaintiff's Amended Complaint.

Respectfully submitted,  
NESENOFF & MILTENBERG, LLP

/s/ Stuart Bernstein  
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